



Local Development Plan 2 (2017 – 2033)

Stakeholder Workshop
23rd January 2019

Pre-Deposit Consultation

Stakeholder Workshop

A Stakeholder workshop in relation to the LDP Pre-Deposit consultation for Pembrokeshire was held on 23rd January 2019 between 10am and 12pm at County Hall, Haverfordwest.

The workshop began with a presentation on the approach of the Preferred Strategy. Following the presentation, a break out session was held. This report details the feedback from that session.

General Questions raised following presentation:

If there is a certificate of lawfulness on a piece of development land should this be included in the settlement limits?

Is the Welsh Governments commitment to growing the Welsh Language factored into the plan? All children will be taught Welsh as a language to 16 now, which should have a positive impact on the language.

Following the presentation, we divided participants into 4 groups, with each being asked to consider whether Strategic Policies address the key issues and drivers and accord with the aims of the Vision and Objectives.

Questions considered:

- Do the policies contribute to addressing the issues identified under the Well-being priority headings?
- Are there any changes you would make to the strategic policies discussed?
- What (if any) additional issues would you want a general or criteria-based policy to pick up for this topic?

1. Living and Working – Michelle and Eirian

Present:

Tony Streatfield (PCC Economy)

Andrew Davies-Wrigley (PCC Housing)

Jo Rees-Wigmore (Planned)

Jonathan Hickin Wales and West Housing

SP 2 Housing Requirement

Group were in agreement with the figures as they are based on projections and evidence.

Discussion about bedroom numbers; older persons may want to downsize to a bungalow/house rather than flats/apartment type accommodation, but limited in terms of bungalows with 1 bedroom. If there was a way to influence this, this would enable home owners to downsize to appropriate housing, freeing up housing with more bedrooms. Could developer be required to provide fewer bedrooms, could s106 contributions be used for this?

Discussion about live-work units and how more people than ever are self-employed and working from home. Appropriate housing is needed to accommodate office/work space in the home.

Some social housing sites will need to be re-developed, a re-design on the sites may then mean a net effect of less housing (ADW).

SP3 Affordable Housing Target

All agreed the numbers identified are appropriate, but also asked if the figure is enough. Acknowledged that the figure is a minimum.

Can the LDP support communities for example in relation to releasing land for affordable housing, perhaps need a general policy on community land trusts?

SP 4 Supporting Prosperity

All supportive of the policy. Discussion about the ageing population, and increase in part time care jobs.

Discussion about candidate sites and whether there had been sites put forward.

Broadband provision needs to be able to support this, including broadband for people working from home. Ensure that fibre broadband is a requirement for a certain threshold of housing.

Also a discussion around people outgrowing their offices at home and needing units to support this expansion.

Discussion on how the LDP could influence developers using apprenticeships within the county, perhaps a role for planning to discuss with education providers. Lack of skilled tradespeople to support development in Pembrokeshire. Larger companies are transporting trades from outside the area. This is an area of opportunity.

Work units are generally not economic for developers – what can change in relation to this?

This policy can support communities to diversify community assets, e.g. community halls to work space, shops other employment opportunities.

SP 6 Settlement Boundaries

Approach supported by the group. W&W housing use a similar approach in relation to settlement hierarchy (transport links, shop etc).

Supports resilient communities, to build communities. Discussion on second homes and the impact that these make on communities, is there more that can be done?

Discussion about the risk to using settlement boundaries, some communities are being lost.

SP 13 Employment Land Provision

Group satisfied that the policy encourages much needed employment sites. Discussion around employment land in Narberth and the impact of the new hospital on housing and prosperity.

GN.5 Infill Development in Hamlets

How do we define local needs housing with respect to this policy?

Are there going to be any restrictions on the type of property? Group would support no restrictions. Also need to look at this in relation to who will deliver land on these sites.

2. Resourceful Communities – Julie

Present:

Claire George (PCC Corporate Strategy)
Huw Jones (PCC Education)
Steve Jardine (PCC Townscape Heritage Initiative)

Charles Hopkinson (Graham Evans)
Phil Lawrence (Agent)
Amy James (Property)
Andrew Vaughan-Harris (Planning Agent)

LDP2 Vision and Objectives

LDP Vision

In 2033 Pembrokeshire is a place with strong resourceful communities, where challenges of rurality and climate change are successfully tackled. A distinctive sense of place exists based on its natural landscape, cultural, built and linguistic heritage. Homes are provided for all and a strong economy enables people of all ages to live, work and thrive in the County. Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted. Town Centres are vibrant places where a range of uses take place. Development is supported by key infrastructure. Across the County green infrastructure and biodiversity are enhanced with accessible and healthy environments delivered for both people and wildlife.

how do we understand the demographics of our communities?
how do we ensure mixed ages in communities?
Don't keep building 4/5 bed homes when need 1/2.

LDP Objectives

- 2.3 Welsh Government policy suggests that LDPs should indicate clearly the plan's main objectives, along with the broad direction of change.¹⁸
- 2.4 It is important that the LDP Objectives reflect the Plan's Vision and set out how the issues identified as facing the area will be addressed through the LDP. The Draft Objectives were developed in conjunction with County Councillors and Key Stakeholders in workshops in April 2018. As with the Draft Vision, this was further refined following an informal public consultation during July – September 2018 and through the ongoing SA/SEA process.

- A) Mitigate and respond to the challenge of Climate Change.
- B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.
- C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises
- D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.
- E) Build on the County's strategic location for green energy, maritime and port related development
- F) Protect and promote the Welsh language.
- G) Support a range of uses in Town Centres to assist regeneration.
- H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.
- I) Improve access to goods and services by facilitating improvements in infrastructure¹⁹ and community facilities and directing development to sustainable locations.
- J) Protect and enhance the County's environment, biodiversity and habitats.
- K) Prevent waste arising and ensure resources are used responsibly.

** need mention of 30% older people & keeping them in homes & communities.* ^{+65 yrs.}

¹⁸ Planning Policy Wales (Edition 9) paragraph 2.2.1

¹⁹ Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

SP 5 Settlement Hierarchy

Additional weight should be afforded to GP surgeries and pharmacies, they should be a primary consideration due to their importance to the local community particularly in the context of an aging population.

Additional weight should be afforded to community centres which have a diversity of uses and roles within the community. Some centres are hubs of activity and this should be recognised.

Changes to the health service delivery – hospital services even if out of county need to be factored into plan in relation to accessibility to services out of county.

Consider the proximity of service villages to hub centres and enable more growth as part of a cluster approach higher up the hierarchy.

SP 5 – Settlement Hierarchy – A Sustainable Settlement Strategy

A settlement hierarchy is defined on the basis of functional characteristics and availability of services and facilities, with respect also for the existing character of a settlement. The hierarchy is as follows:

1. Urban Settlements
Main Towns

Fishguard and Goodwick
Haverfordwest
Milford Haven
Neyland
Pembroke
Pembroke Dock

2. Rural Settlements
2a Rural Town:
Narberth
2b Service Centres:

*is there a model for proximity/cluster.
to hierarchy? eg Tiers Cross gets
points from proximity to Jounshon.*

Do we prioritise brownfield and regeneration sites. We don't have significant amounts of brownfield at the right locations. Town centres are prime areas for inclusion as brownfield.

It is a tough market and getting worse for developers. Greater flexibility is needed to enable sites to come forward.

Infill approach supported. There needs to be more opportunities for local people in rural areas.

Affordable housing and low cost housing discussion. Changes to the approach and SPG requested to enable greater LCHO. However there are issues of where we are gaining units we need to reflect need and have encountered issues over resale and obtaining mortgages. Has previously not been workable.

Need to consider that prestigious sites do not want social landlords and ownership is supported.

We need to take account of changes to approach coming through this Plan and PPWales 10 and SPG will be revised for LDP2.

SP 7 Main Towns

More flexibility needs for types of uses in town centres. Allow greater variety and be less prescriptive. Conversation centred on balance between allowing additional uses where there is a social function and retaining the core to ensure footfall and allows retail to be retained.

e.g. the skateboard park and clustering of development of activity to support that - it is a potential catalyst but does not create a value. Having in town is a good idea with potential for spin offs to town entre business and new business.

SP 7 Main Towns

Within Main Towns, development will support sustainable communities, complementary relationships between towns, place-making and well-being by ensuring:

1. Accessibility by a range of sustainable modes of transport;
2. High quality accommodation that supports diversity within the residential market, access to existing and proposed services and the housing needs of communities;
3. Opportunities for new commercial, retail, employment, tourism, leisure, recreational, green infrastructure and community facilities.

Exceptionally, appropriate land uses which are well-related to the Settlement Boundary

can take place provided they satisfy this and all other policy considerations, including compatibility with Regeneration Frameworks.

Linked Key Issues: *Living and Working, Resourceful Communities, Tackling Rurality, Protecting Our Environment*

This strategic policy will contribute towards achieving objectives: B,C,D,G, H, I, J

can we identify areas ~~we would~~ of bad design & land use we would like to regenerate? eg.

SP 8 Narberth Rural Town, Service Centres and Service Villages

Narberth is a vibrant town with good shopping. It was felt this this was because of advantages with business rates, the physical distribution of the settlement and easy access to the centre (long straggling settlements don't support this) and community action to retain and transform service provision.

Felt that the sequential approach to site selection for a variety of uses (eg hotels) was appropriate and in some cases green field development would be needed.

Comparisons were made between Narberth and Pembroke in terms of vitality and it was felt that the historic environment / listed buildings were a cost factor in securing investment within the town centres.

SP 17 Welsh Language

Strongly felt within the group that plan needs to recognise that there is 'Little England beyond Wales' and limited Welsh speaking within the south of the county. Phasing of sites within the development plan is not an appropriate means of supporting the Welsh language. It means that sites take too long to develop, give difficulty in gaining finance and sale of 1st phase and means that people live in a building site for longer than they need too. Still can't control occupancy.

Contribute to Welsh language development through Section 106, and via education in Welsh medium. Need to ensure that there is a well balanced community of age ranges and social integration, and that threshold is higher than the census level of speaking. Change the threshold unless can be directed at local people.

Issue is relevant to the north of the county and should be applied at a higher threshold even there. Need to encourage local young people to stay.

In relation to the main towns of the settlement hierarchy, more development is proposed under the 60/40% split within English speaking communities in any case.

Self build and affordable housing supported to assist with supporting Welsh language.

GN.2 Sustainable Design

This is a generalised policy which can be 'spun' to fit a development. Local context is important and we should be ambitious in looking for quality in all provision and development coming forward.

excellent / quality / innovative

uses technology reduces impact water- uses less energy

GN. 2 Sustainable Design
Development will be permitted where relevant criteria are met:

1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;
2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;
3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management and storage solutions;
4. It achieves a flexible and adaptable design; ??
5. It creates an inclusive and accessible environment for users that addresses community safety; *long term health/wellbeing needs eg. doorway for wheelchairs, less steps / more ramps*
6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and
7. It contributes to delivering well- designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.

7.12 Delivering sustainable development underpins the Planning system in Wales. As part of the overall sustainable development agenda for Wales and for Pembrokeshire this policy seeks to deliver more sustainable buildings and places by ensuring that all new development is designed and constructed to meet all relevant policy criteria and with low maintenance implications. As well as being of significant importance for all new buildings, the policy criteria will also apply to alterations and extensions to existing buildings. For small scale proposals policy criteria considerations will be proportionate to the type of development proposed.

7.13 Good design is reliant on proposals emerging from an understanding of the site and its context, rather than relying on the unimaginative use of standard site layouts and building types. This policy aims to raise the standard of design for all new development across the County in order to create attractive and functional buildings and spaces and to improve areas of poor design and layout.

7.14 The natural and built environment of Pembrokeshire contributes significantly to the quality of life for both residents of, and visitors to, the area. The Wales Spatial Plan seeks to reverse a trend for Wales to become more uniform with standard building types often failing to reflect traditional local building styles, through the promotion of local distinctiveness. Different design characteristics exist in different areas of the County therefore it is important that developers adopt a design led approach that ensures all new development responds positively to the characteristics of the site and its surroundings. This policy aims to ensure that all new development makes a positive contribution to the local character and distinctiveness of the built and natural environment and the communities within

- > reduce waste in building
- > more community green space designed in biodiversity designed in

80

GN.3 Infrastructure

In rural areas there is a declining bus route service and routes are being cut. National Park takes a more restrictive approach to development which is not a good way forward for split settlements. Should look at more sustainable transport options including electric hook-ups

Felt strongly that we should not judge a rural area based on provision of public transport services and bus routes. Need to be pragmatic and accept situation and allow rural areas to grow.

Broadband - can be implemented via condition. All new development in the county is required to provide opportunity to connect to fibre broadband - comment from Steve Jardine (pipes etc planned in). groups not sure why we need this as stated.

Resourceful Communities Note taken by Julie Kirk 23 Jan 2019

3. Tackling Rurality – Bob and Kane

Present:

Stephen Benger (PCC Highways)

Martin Bell (Pembrokeshire Environment Network)

Peter Sedgwick (Planning Agent)

David Haward (Planning Agent)

Mark John (Planning Agent)

SP 5 Settlement Hierarchy

Surprise was expressed that some settlements had risen in the Settlement Hierarchy. Some group members thought that this might show that LDP 1 had in many cases helped to deliver service retention and sometimes enhancement. However, this was not always the case.

Public transport provision was identified as being a very important consideration in the context of a settlement's sustainability. A link was made between public transport, cycleway and footway provision and the cluster village approach being suggested for some local villages for LDP 2. Many public transport services are subsidised by the County Council and there has been a recent consultation on future services and subsidies. The outcomes from this might need to be reflected in the settlement scoring and hierarchy positions. The group also felt that cycle routes needed to be considered when scoring rural facilities.

Notwithstanding the above, shops are closing in villages and towns across the County. This is making settlements less sustainable and adversely affects well-being for some.

Concern was recorded regarding second homes across the Plan area. There is limited scope to tackle this through planning, as there isn't a separate use class for second homes. PCC is attempting to tackle the issue by levying higher Council Tax on second homes.

The idea of using a settlement hierarchy as a basis for apportionment of future development (particularly housing) was supported. There may be a need to amend the scoring of different services / facilities and to ensure that the most up-to-date position forms the basis for the hierarchy.

Officers were asked to explain what was meant by rurality and to identify the key issues in rural areas. Isolation, hidden pockets of deprivation, poor broadband, limited public transport and loss of village shops were amongst issues identified.

SP 9 Local Villages

The cluster village approach would support rural communities by allowing development in local villages that had their sustainability enhanced by proximity to services and facilities in nearby localities.

SP 10 Countryside

Rural enterprise dwellings help to support rural facilities but in general are not overly sustainable. Welsh Government's TAN 6 provisions guide the approach taken to these.

The group felt that One Planet Developments are having a detrimental impact on local landscapes – perhaps in a similar way to some caravan sites. Welsh Government's TAN 6 also guides the approach taken to these, but some group members felt that the Council should take a different approach to Welsh Government on OPDs.

SP 14 Retail Hierarchy

It was pointed out that the retail hierarchy for the most part relates better to an urban agenda than to the 'tackling rurality' objective. However, what is happening in the towns does affect the villages that are located in the hinterland.

A new general policy may be needed to protect and promote village shops and Post Offices. To achieve flexibility, village halls in use class D should be able to also serve as local shops (use class A). Perhaps the farm shop policy could be expanded?

The restrictive threshold of 30% A1 in towns needs to be reviewed.

SP 16 Minerals

The LDP team was asked to be pro-active in searching for new sand and gravel sites. However, efforts have already been made by the Council and through regional groups, to seek out potential new production sites, without attracting industry interest. Minerals operators are best placed to determine which sites have economic potential.

The location of sand and gravel resources in SW Wales tends to be either on or near the coast, where such deposits were laid down in the last ice age, or in river valleys. Deposits in or near the coast are often within protected landscapes (such as the Pembrokeshire Coast National Park). Those in river valleys are often within sites designated and protected for nature conservation purposes.

SP 18 Transport Infrastructure and Accessibility

Officers were asked to work with transportation colleagues with regard to the approach taken for cluster villages.

Development should be distributed in a manner that reflects transport sustainability.

4. Protecting our Environment - Emma

Present:

Cath Ranson (Ceredigion CC)

Martina Dunne (PCNPA)

Paul Davies (Gerald Blain Architects)

Linda Jones (Acanthas Holden Architects)

Barry Walters (Pembrokeshire College)

SP 1 Creating Sustainable Places

There was a question as to whether SP1 is being too ambitious in expecting to deliver on all criteria on 'All proposals'. Participants felt that a 'balancing policies' approach would be more practical and deliverable. What happens for instance is an application only satisfies 2/7 criteria?

Terms such as 'Reducing' contribution to Climate Change should probably be replaced with 'minimising' as 'reducing' is too ambiguous?

Participants felt there was a definite gap in the policy approach to SP1 is the consideration of economic sustainability. All other aspects are addressed but given the Welsh Governments Regeneration and Economic Development focus it was felt there was a definite weakness in this policy. Sinead Henahan happy to input on this topic further.

SP 5 Settlement Hierarchy

General support for the hierarchy approach.

Reference was made to checking it policy against PPW 10, and specifically 'place making'.

Questions were raised on how the sustainability model differs over different locations and to different people. For example having a 2km distance on Clusters may be reasonable if you are young, but not if you are over 65.

Questions were also raised on our age categorisation. The new working age is 68, but this is not reflected in our thinking. Perhaps the LDP should be looking to raise the age approach to over 68s to reflect government thinking? Furthermore some of our assumptions that over 65s may wish to downsize are questionable – lots of over 65s want a 'hobby' room or have very strong connections with their home and the community/street/area it is located in and will not want to downsize.

SP 11 Protecting and Enhancing the Environment

Questions were raised on what does 'materially harmful development' actually mean?

Reference was made to the Inspectorate still requiring evidence of what enhancements are needed – PINS has a policy paper on Biodiversity that should be consulted.

SP 15 Visitor Economy

Define 'quality'.

Define 'appropriate location' – would 'well related to sustainable facilities' be a better definition? What is appropriate for a caravan application for example? Perhaps this approach should reflect the sustainable communities approach – integrating the policy with the settlement hierarchy? Think of the benefits tourism can bring to a town. Possibly having a regional approach using tourism to boost the economy by being more accepting of growth in certain areas (Fishguard for example).

The Swansea Bay Deal does not recognise the importance of Tourism, therefore our LDP needs to counterbalance this.

Questions were raised on whether we need a GN policy on ancillary services to support tourism facilities.

Landscape impact?

Questions were raised as to whether the enhancement of facilities policy, which allows upgrading of tourers to statics should ask for fewer numbers in order to get environmental enhancements. Others in the group felt this would stifle businesses and that in light of the importance of tourism to the local economy policies such as this should be proactive in using the expanse of sites to sustain local shops etc.

PCNPA hot spots are at capacity.

SP 19 Waste Prevention and Management

All development creates waste – both during construction and also after completion – questions were raised therefore as to how it was possible to 'prevent the creation of waste' referenced in the policy?

Is the second sentence actually RJ?

How will differing wastes be 'balanced'?

Last sentence of Policy - Although the Council may seek to reduce waste it is planning's job to deal with the consequences, not implement council waste policies – reference to 'means' of disposal. Surely planning is reactive to Welsh Government policy, resources and targets? It should be enabling development to meet targets not setting them?

Reference should be made to PPW10 and sustainable design. Are we factoring in recycling space/storage into new builds?

Has consideration been given to the changes coming into force in Pembrokeshire in October regarding recycling? How will this impact on existing facilities, will it mean the closure of local centres, recycling points etc? How will this impact on tourism?

What is the situation with planning contributions through s106 now?

GN.1 General Development Policy

Criterion 2 is heavy on the mention of environmental impacts but there is only one mention of visual impact? Possibly the phraseology should be changed to say 'light industry' or 'amenity' issues rather than naming them all? This would help to rebalance the policy.

What is meant by 'significantly adversely' under criterion 3?

What about 'soundscape' – see PPW10

Criterion 7 Health and Safety is already covered by legislation and shouldn't be repeated in the LDP. Acknowledge the RJ references Hazardous Installations, but this should be in a separate policy (See PPW10 & PCNPA policy).

Criterion 10 – Should this be a separate policy?

Welsh Government have an inquiry into housing delivery – reference should be made to this and that the outcome will be taken into consideration once reported.

7.7 – should reference to surface water disposal here reference the 2019 consenting regime for SDS?